

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**·Caption in Compliance with D.N.J. LBR 9004-1(b)**

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Attorneys for TTLREO, LLC

In Re:

LORI N. LEWKOWITZ

Debtor.

Case No.: 18-26130

Chapter: 13

Hearing Date: 8/18/2020

Judge: Kaplan

**CERTIFICATION OF STEPHEN McNALLY IN SUPPORT OF  
MOTION FOR LEAVE TO FILE PROOF OF CLAIM OUT OF TIME  
PURSUANT TO BANKRUPTCY RULE 9006(b)(1)**

Stephen McNally certifies as follows:

1. I am counsel for TTLREO, LLC (“TTLREO”).
2. TTLREO is the holder of a tax sale certificate representing real property taxes due with respect to property owned by Lori N. Lewkowitz, the above-referenced debtor and debtor-in-possession (the “Debtor”), located at 10 Overlook Terrace, Fords, New Jersey (the “Property”).
3. The Debtor filed its petition for relief under Chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”) on August 13, 2018 (the “Filing Date”).
4. The bar date for filing claims in the Debtor’s case was October 22, 2018 (the “Bar Date”).
5. TTLREO, LLC did not file a proof of claim.
6. The Debtor’s Chapter 13 Plan was confirmed on August 22, 2019, and the plan contemplates the redemption of TTLREO’s certificate.

Federal Rules of Bankruptcy Procedure based on the fact that the claim is fully secured by the Property, acknowledged in the plan, and the Debtor and the Trustee requires the filed claim in order to make a distribution to TTLREO.

8. F.R.B.P. Rule 9006(b)(1) permits the Court to enlarge the time for filing a proof of claim after the passage of the Bar Date if the creditor can establish excusable neglect.

9. Based upon the foregoing, TTLREO respectfully requests that it be permitted to file a proof of claim after the Bar Date. TTLREO has prepared a proof of claim, a copy of which is attached hereto as Exhibit "A," which it will file if given leave of the Court.

I certify that the foregoing is true and correct to the best of my knowledge. I understand that if the foregoing is wilfully false, I am subject to punishment.

Dated: July 27, 2020

/s/ Stephen McNally  
STEPHEN McNALLY